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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROSHERRAL BEVERLY,

Defendant.

Case No.: 2:15-cr-00102-KJD-NJK

**STIPULATION FOR MODIFICATION
OF CONDITIONS OF PRETRIAL
RELEASE**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, United States of America, by and through its attorneys, DANIEL G. BOGDEN, United States Attorney, NICHOLAS DICKINSON, Assistant United States Attorney, and Defendant, ROSHERRAL BEVERLY, by and through her attorney, MARK B. BAILUS, ESQ. of the law firm of BAILUS COOK & KELESIS, LTD., that the conditions of Defendant's pretrial release be modified as to condition number thirty-one (31) of the Appearance Bond (Doc. #9) deleting the phrase "potential witnesses" with the remainder of said condition remaining in effect. The modified condition would then read "The defendant shall avoid all contact directly or indirectly with any person who is or may become a victim in the investigation or prosecution, including but not limited to: _____."

This stipulation is entered into for the following reasons:

1. One of the potential witnesses is a friend of the Defendant who works in the same office as the Defendant and another potential witness is her sister who also works in the office with Defendant. Both potential witnesses interact with the Defendant on a social basis as well.

2. Samira Barlow of U.S. Pretrial Services has been contacted regarding this modification and has no objection to the change.

DATED this ____ day of April, 2015.

BAILUS COOK & KELESIS, LTD.

UNITED STATES OF AMERICA

By _____
MARK B. BAILUS, ESQ.
Nevada Bar No. 2284
517 S. Ninth Street
Las Vegas, Nevada 89101
Attorney for Defendant
Rosherral Beverly

By _____
NICHOLAS DICKINSON
Assistant United States Attorney
333 S. Las Vegas Blvd., 5th Floor
Las Vegas, Nevada 89101
Attorneys for Plaintiff
United States of America

ORDER

IT IS THEREFORE ORDERED that condition number thirty-one (31) of the Appearance Bond (Doc. #9) shall be modified and the phrase “potential witnesses” is to be deleted and the remainder of said condition shall remain in effect. Condition number thirty-one (31) of the Appearance Bond (Doc. #9) shall provide “The defendant shall avoid all contact directly or indirectly with any person who is or may become a victim in the investigation or prosecution, including but not limited to: _____.”

DATED this 28th day of April, 2015.


UNITED STATES MAGISTRATE JUDGE

Submitted By:

BAILUS COOK & KELESIS, LTD.

Mark B. Bailus, Esq. (2284)
517 S. Ninth Street
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